United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA0000437	17 04 27	I	R	3

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 70 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Mensonides Dairy, LLC 305 South Fisher Road Mabton, Washington 98935	1:00 PM/ 04/27/17	Unpermitted
	Exit Time/Date	Permit Expiration Date
	2:52 PM/ 04/27/17	Unpermitted

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Amy Mensonides/Bookkeeper/(509) 894-9902	Compliance Evaluation Inspection Lat.: 46.187848 Long.: -119.935271
Name, Address of Responsible Official/Title/Phone and Fax Number Art Mensonides, Owner and Operator, (b) (6) 305 South Fisher Road Mabton, Washington 98935	Contacted ☑ Yes ☐ No SIC: 0241 (Dairy Farm) NAICS: 112120

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☐ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☐ Storm Water	
☑ Effluent/Receiving Waters	☐ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
	See the attached report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Joseph Roberto	EPA/OCE/206-553-1669	05/01/17
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Kimberly A. Cole	EPA/OCE/MIRE 3-0955	5/16/17

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS, 5-3-17 J. Brown

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	(	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	)	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

NPDES
Inspection Report

Mensonides Dairy, LLC
(NPDES Permit #: Unpermitted)

Mabton, Washington

Inspection Date: April 27, 2017

Prepared by:

Joe Roberto
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multimedia Inspection and RCRA Enforcement Unit

Table of Contents

I. Overview

This inspection report documents the findings of the National Pollutant Discharge Elimination System (NPDES) compliance inspection conducted by the United States Environmental Protection Agency (EPA) at Mensonides Dairy, LLC (facility) on April 27, 2017.

This compliance inspection consisted of a(n):

- **Opening Conference** - During the opening conference, I provided a business card and presented my inspector credentials to the facility representative. During the opening conference, I discussed the purpose and expectations of the inspection.

- **Site Review** - During the site review we examined the areas of the facility associated with the dairy operation. This included a view of the animal confinement areas, confinement area flushing system, wastewater storage ponds, compost piles, and the feed storage areas. See Section VI of this report for details of the site review.

- **Records Review** - During the inspection, I requested to see the nutrient management plan (NMP) records. See Section IV.H of this report for details regarding the records review conducted as part of the inspection.

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Clean Water Act. **For this facility, this meant evaluating whether manure, manure laden wastewater, or other wastewater associated with this dairy operation is leaving the facility and entering waters of the United States.** This evaluation did not include the collection of wastewater samples.

Unless otherwise noted, all details in this inspection report were obtained from conversations with Ms. Amy Mensonides or from observations during the inspection. Certain details in this report are also based on information obtained from phone discussions with Mr. Stuart Turner, a consultant to Mr. Mensonides.

II. Inspection Entry

Specifics regarding entry to this facility are as follows:

- The inspection of this facility was unannounced.
- This was an EPA led inspection, although I was accompanied by Mr. Daniel McCarty with the Washington State Department of Agriculture (WSDA).
- I presented credentials to Ms. Amy Mensonides upon arriving at the facility. Ms. Mensonides is the bookkeeper and daughter of the owner and operator of the dairy (Art Mensonides).
- I explained to Ms. Mensonides that this visit was a compliance inspection to

determine if manure or manure laden wastewater or any other discharges from the facility were entering nearby waterways.

- Ms. Mensonides indicated that the owner of the facility was not available and that he was the only one that would be able to allow access to conduct the inspection. I then asked Ms. Mensonides if she could contact Mr. Mensonides to obtain permission to allow the inspection. Ms. Mensonides contact Mr. Mensonides by phone and was able to obtain permission to allow the inspection to occur.
- Ms. Mensonides accompanied us throughout the inspection.
- We were allowed to inspect all areas of the facility that we requested to inspect.

III. Inspection Information

Facility Name	**Mensonides Dairy, LLC**
Inspection Date	April 27, 2017
Time Arrived	1:00 PM
Time Departed	2:52 PM
Weather Condition	Clear and Dry
Facility Representatives Present	Ms. Amy Mensonides was present throughout the inspection.
Inspection Team	Joe Roberto (EPA Lead Inspector) Daniel McCarty (WSDA)
Observed Discharge	I did not see a wastewater discharge from this facility at the time of the inspection. I also did not see any evidence of past discharges.
Inspection Type	Compliance evaluation inspection, without sample collection

IV. Facility Information

A. General Information

Owner and Operator	**Mr. Art Mensonides**
Type of Operation	Dairy
Standard Industrial Classification (SIC) Code	0241 (Dairy Farms)
North American Industrial Classification System (NAICS) Code	112120 (Dairy Cattle and Milk Production)

Physical Address	305 South Fisher Road Mabton, Washington 98935
Mailing Address	305 South Fisher Road Mabton, Washington 98935
GPS Coordinates	+46.187848°/-119.935271°
Permit Status	This facility is not currently covered by an NPDES permit.
Receiving Water	The nearest receiving water is the irrigation lateral along the north side of the facility. Note that there was inadequate information available at the time of the inspection to determine where this irrigation lateral ultimately routes runoff. See Attachment A for details.
Length of Operation	This facility was built in 2001 and they started milking cows in 2002.
Number of Employees	75 to 80 (According to Stuart Turner)

B. Facility Contacts

Name	Title	Phone Number	Email Address
Art Mensonides	Owner and Operator	(b) (6) (cell)	milkcows@clearwire.net
Amy Mensonides	Bookkeeper	(509) 894-9902	milkcows@clearwire.net
Stuart Turner	Consultant	(509) 539-5524	agforensic@aol.com

C. Facility Description

This facility is a dairy operation owned and operated by Mr. Art Mensonides. This dairy operation consists of confinement pens, a solids separation system, wastewater storage ponds, nearby fields for manure application, and manure compost piles. This operation currently confines dairy cattle of various ages ranging from calves less than six months old to milking cows. See Attachment A for details regarding the major components of this facility.

D. Facility Size

The facility includes approximately 385 acres owned by the facility which are used for animal confinement and manure handling, including composting. The facility also owns over 1300 acres which is used for manure application.

At least 32,000 acres of additional acreage is also available to the facility for manure application. This additional acreage is available through third party agreements with local farmers.

E. Number of Animals

At the time of the inspection, the facility confined the following number of animals:

- 5,471 milking cows,
- 361 dry cows, and
- 5,498 heifers and calves.

F. Length of Animal Confinement

According to Mr. Turner, cattle at this facility are confined throughout the year in the animal confinement areas.

G. Vegetation in the Confinement Area

I did not see any vegetation in the animal confinement areas at the time of the inspection.

H. NMP

At the time of the inspection, I asked Ms. Mensonides for a copy of the facility NMP documentation. This facility does have a NMP. File information indicates that the NMP was created on May 19, 2003 and was last updated on May 14, 2010.

The NMP specifies that the number of animals maintained at this facility is as follows:

- 5,300 milking cows,
- 1,000 dry cows, and
- 10,300 heifers and calves.

Note that the review of the NMP documentation was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature. Any NMP deficiencies observed are listed in the "Areas of Concern" section of this report.

I. Manure Storage and Handling

This facility is designed with the goal of not discharging manure, manure laden wastewater, or other wastewater from the dairy to waters of the United States. This goal is accomplished by containing all generated dairy wastes onsite within the dairy facility until it can be land applied as fertilizer on nearby farm ground.

The bulk of the waste and wastewater at this facility is generated in the animal confinement area of the dairy. Several of the confinement areas at this facility are cleaned using a flush system where recycled wastewater is used to flush accumulated manure in the confinement areas. The **flush water** generated at this facility is managed through a solids separation system. The liquid portion of the waste is stored in wastewater storage ponds and reused for flushing the pens or stored in the ponds until it can be land applied to nearby farm fields and utilized as fertilizer. This facility utilizes several wastewater storage ponds with a total capacity of greater than 82 million gallons. According to Mr. Turner, this facility has approximately eight months of wastewater storage capacity.

Manure **solids** generated at the facility are either stored within the open lot confinement areas, or extracted with the solids separation system. All solids at this facility are composted and then ultimately applied on nearby farm ground and utilized as fertilizer.

J. Animal Access to Waters of the United States
Animals at this facility are confined within pens and as a result do not have access to surface waters.

K. Dead Animal Disposal
Dead animals from this facility are composted onsite.

V. Compliance History

The last routine inspection of this facility was conducted by the WSDA on November 4, 2015. The report for this inspection indicated that the facility was out of compliance due to high nitrogen levels in the soil. The facility has been working to address this issue. See Attachment B for a copy of the November 4, 2015 inspection report.

VI. Site Review

The site review of this facility included a view of the confinement areas, wastewater storage ponds, feed storage areas, and the compost piles. See Attachment A of this report which includes an aerial image and photographic documentation of the facility as seen during the site review.

Specifically, the site review included a view of the following:

- animal confinement areas (see photograph #s 1, 3 and 4 of Attachment A),
- confinement area flushing system (see photograph #s 1 to 3 of Attachment A),
- wastewater storage ponds (see photograph #s 5 to 7 and 9 of Attachment A),
- the compost piles (see photograph #s 8 and 10 of Attachment A), and
- the feed storage areas (see photograph #s 13 and 14 of Attachment A).

VII. Areas of Concern

I did not identify any areas of concern at the time of this inspection.

VIII. Closing Conference

I did not have a closing conference at the time of this inspection. Instead, I indicated to Ms. Mensonides that I would contact Mr. Art Mensonides when I returned to the office to

discuss the inspection findings.

Upon returning to the office, I attempted to contact Mr. Mensonides by phone. I was not able to reach Mr. Mensonides in person, so I left a voice mail requesting that he return my call. Sometime after I left my initial voice mail, I received a call from Mr. Stuart Turner, consultant for Mr. Mensonides. Mr. Turner indicated that he would be representing Mr. Mensonides.

During my conversation with Mr. Turner, I informed him of the inspection findings. I also asked additional questions regarding the dairy operation. I then asked Mr. Turner to thank Mr. Mensonides for accommodating us during the inspection.

Report Completion Date: May 12, 2017

Lead Inspector Signature:

ATTACHMENT A

Photograph Documentation

Unless otherwise noted, all photographs were taken by Joe Roberto on April 27, 2017 using a Samsung SL605.

This Attachment includes an aerial image of the facility. This aerial image contains hexagons (⬡→) which identify the approximate location of the photographer where certain Photograph Documentation photographs were taken. The number within the hexagon corresponds with the Photograph Documentation photo number. The arrow attached to the hexagon indicates the direction of the photograph.

Mensonides Dairy, LLC


Mensonides Dairy
14
13
11&12
1&2
3
4
10
Main
Pond
9
Solids
Separator
Pond
#1
Pond
#2
Pond
#3
5
6
7
8
N

Photo #1: Easterly view showing the flush water collection pit which collects flush water used to clean the confinement areas. Water in this collection pit is then routed to the solids separation system and the pond system. Camera photograph #SAM 2790.

Photo #2: Closeup of the flush water collection pit shown above. Camera photograph #SAM 2791.

Photo #3: Easterly view showing one of the cow confinement areas. Camera photograph #SAM 2792.

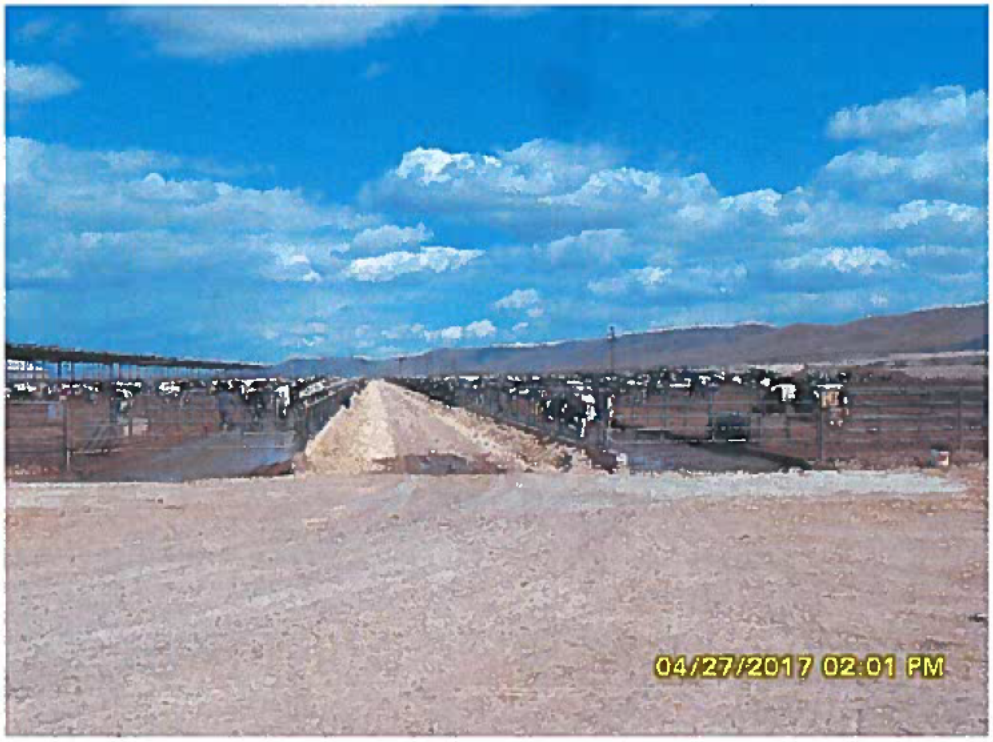

Photo #4: Easterly view showing one of the open lot confinement areas. Camera photograph #SAM 2793.

Photo #5: Northwesterly view showing pond #1 in the background and pond #2 in the foreground. Camera photograph #SAM 2794.

Photo #6: Northerly view showing pond #2 on center and pond #1 on the left. Camera photograph #SAM 2795.

Photo #7: Northeasterly view showing pond #3 on center and pond #2 on the left. Camera photograph #SAM 2796.

Photo #8: Easterly view showing compost piles in the background. Also note the southeast corner of pond #3 on the left. Camera photograph #SAM 2796.

Photo #9: Westerly view showing the main pond. Camera photograph #SAM 2798.

Photo #10: Southerly view showing the compost piles located near the northeast corner of the facility. Camera photograph #SAM 2799.

Photo #11: Blurred southerly view of a drainage area just south of the commodity storage area of the facility. Camera photograph #SAM 2800.

Photo #12: Southerly view of a drainage area just south of the commodity storage area of the facility. The is the same view as the previous photograph. Camera photograph #SAM 2801.

Photo #13: Northwesterly view showing the open end of one of the silage bunkers. Camera photograph #SAM 2802.

Photo #14: Southerly view showing the covered silage bunkers. Camera photograph #SAM 2803.

ATTACHMENT B

November 4, 2015 WSDA Inspection Report

Mensonides Dairy, LLC

Washington State Department of Agriculture
Dairy Nutrient Management Program
PO Box 42560
Olympia WA 98504-2560
(360) 902-1982

Document Number: IR-2964

Dairy Nutrient Management Program - Inspection Report

Facility Information

Business Name: Mensonides Dairy LLC **Livestock Type:** Dairy **Status:** Active

CAFO Permit? None **CAFO Permit ID:** **CAFO Issue Date:** **CAFO Term. Date:**

AG ID No: 2056 **License Issue Date:** 10/21/2002

Site Address: 305 S Fisher Rd Mabton,WA 98935

Mailing Address: 305 S Fisher Rd Mabton,WA 98935

Conservation District: South Yakima **County:** Yakima **Region:** EA

Facility Contact(s)

Title	First Name	Last Name	Business Phone	Other Phone	Cell Phone	Email
Operator	Art	Mensonides	(509) 894-9902		(b) (6) 8	milkcows@clearwire.net

Inspection Report

Inspection Type: Routine

Date of Inspection: 11/04/2015 **Arrival Time:** 1:15 PM **Departure Time:** 3:00 PM

WSDA Inspector(s): Daniel McCarty

Other(s) Attending: Stu Turner

Compliance Activity

Overall Compliance: ◉Out of Compliance

Compliance Recommendation: ☐Formal Enforcement ☐NOC ☒Warning

Outcomes ☒N/A

Follow Up Activity

Is follow up required? ◉Yes ○No

Follow up required:
- ☐Facility Issues
- ☐NMP Updates
- ☐Recordkeeping Issues
- ☒Application Issues **Date:**12/1/2016
- ☐Technical Assistance

Technical Assistance:
Technical Assistance Conservation District: South Yakima
Conservation District Phone: 509-829-9025
Conservation District Email: lc@sycd.us

Comments:

Additional comments attached? ○Yes ◉No

Please send requested information to Dairy Nutrient Management Program, WSDA
For questions about this inspection, please contact:

Producer approves to have a copy of report sent to: Stu Turner

Inspector Inspection Comments

Several fields have elevated N levels (Post application sample results). They will not have any manure applied to them in 2015-16 and will be double cropping with trit and corn. Records are in great shape. Thank you for your time.

Infrastructure

Main Dairy Facility	No issues noted
Main Lagoon Storage	No issues noted
SP1 Lagoon Storage	No issues noted
SP2 Lagoon Storage	No issues noted
SP Lagoon Storage	No issues noted
Catch Basin Lagoon Storage	No issues noted
SB Lagoon Storage	No issues noted
Silage pits Feed Storage	No issues noted
Mortalities Storage [X] Composted	

Comments:

Recordkeeping

	Y	N	NA	If "No", which years are not maintained?				
Are required application records maintained?	◉	○	○					
Comments:								
Are required nutrient test records maintained?	◉	○	○					
Comments:								
Are required nutrient transfer records maintained?	◉	○	○					
Comments:								

Contact info for person(s) receiving nutrients:

Last Name	First Name	Mailing Address	Mailing City	Mailing State	Mailing Zipcode	Nutrient Use	Type	Amount Exported	Unit	N Analysis Amount	Analysis Unit

Are required soil test records maintained?	◉	○	○					
Comments:								
Are required irrigation records maintained?	◉	○	○					
Comments:								
Are digestate records maintained?	○	○	◉					
Comments:								
Are other records maintained?	○	○	◉					
Comments:								

Comments:

Agronomy

1. Do enough records exist to make a determination of agronomic application ◉Yes ○No

Soils in the following fields are above 45ppm fall nitrate level:

Field #	Acres	2015	2014	2013	2012	2011	2010
5	22.00	215.00	63.00	164.00	209.00	267.00	**15.00**
7	60.00	176.00	**37.00**	1014.00	839.00	226.00	165.00
8	50.00	89.00	**29.00**	653.00	351.00	106.00	**31.00**
1	165.00	33.00	54.00	286.00	153.00	71.00	71.00
2	36.00	25.00	44.00	618.00	175.00	145.00	110.00
3	36.00	14.00	65.00	122.00	224.00	91.00	**43.00**
4	36.00	18.00	48.00	409.00	**27.00**	94.00	125.00

Total Acres: 405.00

2. Number of acres with three of last five years below 45 PPM nitrate in the top foot of soil: 27626
3. Number of acres with three of last five years at or above 45 PPM nitrate in the top foot of soil: 405.00

Soils in the following fields are above 100ppm phosphorus level:

Field #	Acres	2015	2014	2013	2012	2011	2010

Total Acres: 0

4. Number of acres with three of last five years below 100 PPM phosphorus in the top foot of soil: 28031
5. Number of acres with three of last five years at or above 100 PPM phosphorus in the top foot of soil: 0

Comments:

Nutrient Management Plan Information

1. Does the farm have a nutrient management plan (NMP)? ◉Yes ○No

2. Is the NMP on site? ◉Yes ○No

3. Are animal numbers based on revised WSP? ◉Yes ○No **If Yes, Date:** 5/1/2010

Land for Nutrient Application	NMP #	Range - NMP	Current #	Range - Current
Acres Owned	726.00		1147.00	
Acres Leased or Rented	26884.00		26884.00	
Total				

Livestock (Dairy)	A#-NMP	Range-NMP	A#-Current	Range-Current
Milking Cows	5300		5000	
Dry Cows	1000		385	
Heifers (6 mos - fresh)	5300		4943	
Calves (0 - 6 mos)	5000		313	
Total animals on site	16600		10641	

Comments:

Application Assessment ☒N/A

CAFO ☒N/A